



December 23, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 07-135, 05-337, 03-109;  
GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208**

Dear Ms. Dortch:

On December 22, 2011, Micah Caldwell, Vice President, Regulatory Affairs of the Independent Telephone & Telecommunications Alliance (“ITTA”) made separate *ex parte* presentations by phone to Michael Steffen, special counsel in the Office of General Counsel; Lisa Hone, wireline legal advisor to Commissioner Copps; Angela Kronenberg, wireline legal advisor to Commissioner Clyburn; and Rebekah Goodheart, Associate Bureau Chief of the Wireline Competition Bureau.

During these presentations, Ms. Caldwell expressed support for requests by several parties to reduce rates for the exchange of LEC-CMRS intraMTA traffic in accordance with the same multi-year transition that applies to other terminating traffic, or at a minimum, to delay reductions in rates for such traffic until July 1, 2012, when the Access Recovery Mechanism is in place.<sup>1</sup> Contrary to the Commission’s conclusion in the Report and Order that the impact of an immediate transition to bill-and-keep for LEC-CMRS intraMTA traffic “is not significant” because “most large incumbent LECs have already adopted \$0.0007 or less as their reciprocal compensation rate,”<sup>2</sup> this change will result in a substantial reduction in intercarrier

<sup>1</sup> See, e.g., letter from Matthew S. DelNero, counsel to TDS Telecom, to Marlene Dortch, FCC, WC Docket Nos. 10-90, *et al.* (filed Dec. 19, 2011); letter from Michael Romano, NTCA, to Marlene Dortch, FCC, WC Docket Nos. 10-90, *et al.* (filed Dec. 14, 2011); letter from Karen Brinkmann, counsel to CenturyLink, FairPoint, Frontier, and Windstream, to Marlene Dortch, FCC, CC Docket Nos. 01-92, *et al.* (filed Dec. 14, 2011) (the “Mid-Sized Price Cap ILEC Letter”), as supplemented December 20, 2011, letter from CenturyLink, Frontier, FairPoint, and Windstream to Marlene Dortch, FCC, CC Docket Nos. 01-92, *et al.* (filed Dec. 20, 2011).

<sup>2</sup> *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶ 997 (rel. Nov. 18, 2011).

Ms. Marlene H. Dortch  
December 23, 2011  
Page 2

compensation revenues for carriers because many interconnection agreements establish reciprocal compensation rates for LEC-CMRS intraMTA traffic that are “much higher than \$0.0007.”<sup>3</sup>

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed electronically in the above-referenced dockets.<sup>4</sup> Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,



Micah M. Caldwell  
Vice President, Regulatory Affairs

cc: Michael Steffen  
Lisa Hone  
Angela Kronenberg  
Rebekah Goodheart

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<sup>3</sup> Mid-Sized Price Cap ILEC Letter at 2; *see also* letter from Thomas Jones, counsel for Integra Telecom, Inc. and tw telecom inc., to Marlene Dortch, FCC, CC Docket Nos. 01-92, *et al.*, p. 2 (filed Dec. 19, 2011).

<sup>4</sup> 47 C.F.R. § 1.1206.